



## NATIONAL POTATO COUNCIL

---

1300 L Street, NW, Suite 910  
Washington, DC 20005  
202.682.9456 · 202.682.0333 fax  
[www.nationalpotatocouncil.org](http://www.nationalpotatocouncil.org)  
[spudinfo@nationalpotatocouncil.org](mailto:spudinfo@nationalpotatocouncil.org)

November 17, 2006

Standardization Section  
Fresh Products Branch, Fruit and Vegetable Programs  
Agricultural Marketing Service  
United States Department of Agriculture  
1400 Independence Avenue, SW  
Room 1661 South Building  
Washington, D.C. 20250-0240

RE: [Docket Number FV-06-303] Potatoes; Grade Standards

To Whom It May Concern:

These comments are being submitted on behalf of the National Potato Council (NPC). NPC represents more than 90 percent of the potato growers and potato production in the United States. NPC and the members of our organization participated directly in the efforts to modernize the potato grade and to harmonize those standards with Canadian regulations. The efforts of the Agricultural Marketing Service (AMS) were instrumental in providing the technical expertise to our industry that aided the development of a consensus for modifications to the potato grade standards.

By and large, the changes to the potato grade standards published in the Federal Register, (Vol. 71, No. 184), dated September 22, 2006 reflect the consensus developed by the industry. While our comments will indicate some areas needing refinement or clarification, we strongly support the vast majority of the changes as put forward in the proposed rule.

The following comments are on Section 51.1564:

External Defects—

We believe the term “appearance” is too subjective to be used in evaluating the tuber for bruising. We suggest that USDA remove the phrase “when materially detracting from appearance of the potato” and allow the bruise standard to rely solely on removals of flesh from the potato that in total for an individual potato result in the loss of more than 5 percent of the total weight of the potato or “when the area affected is more than 5 percent of the surface in aggregate (i.e.,  $\frac{3}{4}$  inch on a 2  $\frac{1}{2}$  inch or 6 oz. potato). Correspondingly lesser or greater areas in smaller or larger potatoes.” We would also note that, in other areas of the proposed rule where the definition or standard hinges on the losses resulting from the removal of portions of the

potato, it be made clear that it is the total of the aggregate removals that are counted for each potato.

#### Elephant Hide—

We support the addition of a category to allow for the consideration of this tuber condition. To make this category of external defect useful and consistent, USDA needs to develop and incorporate into the standard visual aids that allow effective comparison of the sample and the standard.

#### External Discoloration—

We suggest that a specific color chip must be associated with this condition. Otherwise the evaluation of the tubers will be completely subjective and inconsistent results are likely. USDA should consider using Pot-L-1, Photo 111 as the standard for light tan and Pot-L-1, Photo 109 as the standard for light brown.

#### Grub Damage—

We support the inclusion of the grade standard criteria. We would note that in Table III the criteria for “Damage” and “Serious Damage” utilize the same measurement criteria to determine two different damage levels. Both utilize the  $\frac{3}{4}$  inch on a 2  $\frac{1}{2}$  inch or 6 ounce potato. We recommend 1 inch on a 2  $\frac{1}{2}$  inch or 6 ounce potato as an indicator of serious damage.

#### Rodent and Bird Damage—

Both the damage and the serious damage criteria are the same. We recommend 1 inch on a 2  $\frac{1}{2}$  inch or 6 ounce potato as the standard for serious damage.

#### Silver Scurf—

We support the addition of this condition to the grade standards but suggest that the threshold be set at 55 percent rather than the 50 percent contained in the proposed rule.

#### Sprouts—

We support leaving the standard for sprouts unchanged. It should remain a single standard to determine damage based on 10 percent of the potatoes having any sprout more than  $\frac{3}{4}$  inch. There needs to be no distinction for different tolerances at shipping and receiving. The existence of a  $\frac{3}{4}$  inch sprout constitutes a level of damage unacceptable to the industry at all levels.

The industry would like to obtain more information on the other color chips that were evaluated prior to making the determination that the POT-CC-22 chip was the appropriate chip for use in

Standardization Section

Page 3

November 17, 2006

evaluating Internal Black Spot. Without the ability to view other chips that were considered, it is difficult to determine if the chip chosen is the most reliable indicator of significant tuber damage.

Finally, we would encourage USDA to review the proposed rule and eliminate all references to the "appearance" of the potato and strictly rely on more quantitative measures that can be evaluated more consistently. In most (Bruise, Enlarged Lenticels, Flea Beetle, Second Growth) but not all cases, (Dirt), a second objective standard, is already incorporated into the proposed rule.

Thank you for considering the NPC comments. We look forward to providing any additional information that will assist USDA in this process.

Sincerely,

A handwritten signature in black ink, appearing to read "John Keeling". The signature is fluid and cursive, with the first name "John" and last name "Keeling" clearly distinguishable.

John Keeling

Executive Vice President and CEO